



WESTCLIFF UNIVERSITY

TITLE IX

REGULATIONS AND POLICY HANDBOOK

2026-2027



WESTCLIFF UNIVERSITY

Title IX Regulations & Policy

The U.S. Department of Education (ED) enforces Title IX which protects students and employees from discrimination based on sex in education programs or activities that receive Federal financial assistance.

Title IX of the Education Amendments of 1972 (Title IX) states:

No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.

The federal Title IX provisions of this Policy apply to allegations of Title IX Sexual Harassment occurring against a person in the United States within the University's education program or activity. An education program or activity includes locations, events, or circumstances over which the University exercised substantial control over both the Respondent and the context in which the alleged Sexual Harassment occurred. It also includes any building owned or controlled by a student organization that is officially recognized by the University.

Alleged conduct that occurred outside the University's education program or activity or outside the United States is not subject to the federal Title IX grievance process. However, such conduct may be addressed under other applicable University policies when it affects the University community or a person's access to the University's education program or activity. The University may also offer reasonably available Supportive Measures regardless of whether the alleged conduct falls within federal Title IX jurisdiction.

The University reserves the right to make changes to this policy as necessary, and once those changes are posted online, they are in effect. If government laws or regulations change or court decisions alter the requirements in a way that impacts this policy, this policy will be construed to comply with the most recent government laws, regulations, or court holdings.

Statement of Non-Discrimination

Westcliff University (the "University") does not discriminate on the basis of sex and prohibits sex discrimination in any education program or activity that it operates, including admissions and employment. The University is required by Title IX of the Education Amendments of 1972 and its implementing regulations not to discriminate in this manner.

The University also prohibits discrimination and harassment based on sex stereotypes, sex characteristics, pregnancy, childbirth or related medical conditions, sexual orientation, gender identity, and gender expression, as required by applicable federal and California law and University policy. sexual harassment, including Title IX sexual harassment, is a form of sex discrimination. The University prohibits retaliation against any person for reporting sex discrimination, submitting a complaint, or participating in a related investigation or grievance process.



Inquiries regarding Title IX may be referred to the University's Title IX Coordinator, the U.S. Department of Education's Office for Civil Rights, or both. The University's Title IX Coordinator is **Christina Powers**, 17877 Von Karman Ave. Suite 400 Irvine, CA 92614, 949-825-5999, titleixcoordinator@westcliff.edu

Please see below for information about how to report conduct that may constitute sex discrimination, including Title IX Sexual Harassment or retaliation; how to submit a complaint of sex discrimination; how to file a Formal Complaint of Title IX Sexual Harassment; and the University's applicable grievance procedures.

If you believe that you have experienced or witnessed sexual harassment, discrimination or retaliation, the University encourages you to notify the Title IX Coordinator as soon as possible after the incident.

Title IX Coordinator

When the University has actual knowledge of sexual harassment in an education program or activity of the University against a person in the United States, the University will respond promptly in a manner that is not deliberately indifferent. A response is deliberately indifferent only if it is clearly unreasonable in light of the known circumstances. For purposes of federal Title IX, the University has actual knowledge when notice of sexual harassment or allegations of sexual harassment is received by the Title IX Coordinator or by a University official who has authority to institute corrective measures on behalf of the University.

Title IX Coordinator: Christina Powers

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Deputy Title IX Coordinator: Josh Schoonover

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The Title IX Coordinator is responsible for coordinating the University's compliance with Title IX; receiving reports and complaints of sex discrimination, including Title IX Sexual Harassment and retaliation; coordinating Supportive Measures; and transmitting qualifying reports to the designated Clery official for purposes of Clery Act reporting.

Any person may report sex discrimination, including Title IX Sexual Harassment or retaliation, to the Title IX Coordinator or Deputy Title IX Coordinator in person, by mail, telephone, or email using the contact information listed above. A report may be made at any time, including outside regular business hours. Staff responses to reports submitted outside regular business hours, including weekends and holidays, may occur on the following business day.

Key Definitions

Affirmative Consent: means an agreement to engage in sexual activity that is informed, affirmative, conscious, voluntary, and mutual. Affirmative Consent must be given freely and without coercion, force, threats, intimidation, or by taking advantage of another person's incapacitation. It is the responsibility of each person involved in the sexual activity to ensure Affirmative Consent has been obtained from the other participant(s) prior to engaging in the sexual activity.

- i. Affirmative consent is given by clear words or actions. Affirmative consent includes knowledge and agreement to engage in the specific sexual activity.
- ii. Affirmative Consent must be ongoing throughout a sexual activity and can be withdrawn or revoked at any time, including after sexual activity begins. Once consent is withdrawn or revoked and clearly communicated, the sexual activity must stop immediately.
- iii. Consent to one form of sexual activity or one sexual act does not constitute consent to other forms of sexual activity. Consent given to sexual activity on one occasion does not constitute consent on another occasion.
- iv. Affirmative Consent cannot be inferred from an existing or previous dating, social, or sexual relationship between the Parties.
- v. Silence does not mean there is Affirmative Consent.
- vi. Lack of protest or resistance does not mean there is Affirmative Consent.
- vii. A request for someone to use a condom or birth control does not, in and of itself, mean there is Affirmative Consent.
- viii. Affirmative Consent cannot be given by a person who is incapacitated. A person is unable to consent when asleep, unconscious, or incapacitated due to the influence of drugs, alcohol, or medication.

Title IX Sexual Harassment: conduct on the basis of sex that satisfies one or more of the following:

1. A University employee conditioning the provision of an aid, benefit, or service of the University on an individual's participation in unwelcome sexual conduct;
2. Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the University's education program or activity; or
3. Sexual assault, dating violence, domestic violence, or stalking, as defined by applicable federal law.

* Please note: In accordance with the Violence Against Women Reauthorization Act of 2013 ("VAWA"), state definitions for Sexual Assault, Dating Violence, Domestic Violence, Stalking and Consent are contained in the University's [Annual Security Report \("ASR"\)](#). VAWA crimes are reported in the ASR based on the definitions above.

Complainant: An individual alleged to be the victim of conduct that could constitute sexual harassment.



Respondent: An individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment.

Parties: include the Complainant(s) and Respondent(s) collectively.

Advisor: An individual chosen by a Complainant or Respondent to provide support and assistance during the Title IX Grievance Process. An Advisor may be, but is not required to be, an attorney. The Advisor's role and responsibilities are described in the Advisor section of this Policy.

Formal Complaint: A document (hardcopy or electronic) filed by a Complainant or signed by the Title IX Coordinator alleging sexual harassment against a Respondent and requesting that the University investigate. A Formal Complaint must be signed (physical or digital) by the Complainant, the Title IX Coordinator, or otherwise indicate that the Complainant is the person filing the Formal Complaint. At the time of filing a Formal Complaint, the Complainant must be participating in or attempting to participate in the University's education Program or Activity with which the Formal Complaint is filed.

Education Program or Activity: On or off campus locations, including housing, events, or circumstances over which the University exercises substantial control over both the Respondent and the context in which the alleged Title IX Sexual Harassment occurred and also includes any building owned or controlled by a student organization that is officially recognized by the University.

Mandatory Reporter: A University employee designated under University policy or applicable California law to promptly report known or suspected sex discrimination, including Title IX Sexual Harassment and retaliation, to the Title IX Coordinator. The University's designation of Mandatory Reporters does not alter the federal actual-knowledge standard described in this Policy. Employees who are not Mandatory Reporters are expected to provide an individual reporting possible sex discrimination with the Title IX Coordinator's contact information and information about available reporting options.

Confidential Resource: An individual or organization that provides assistance under a legally protected confidential or privileged relationship, such as a licensed healthcare provider, mental health professional, attorney, or clergy member acting within the scope of that professional role. The University does not employ a designated Confidential Resource. Information about external confidential resources is available in each campus's survivor guide.

Disciplinary Sanctions: Consequences imposed on a Respondent following a determination under Title IX that the Respondent violated the University's prohibition on Title IX Sexual Harassment.

Relevant: Related to the allegations of Title IX Sexual Harassment under investigation as part of these grievance procedures. Questions are relevant when they seek evidence that may aid in showing whether the alleged Title IX Sexual Harassment occurred, and evidence is relevant when it may aid a decisionmaker in determining whether the alleged Title IX Sexual Harassment occurred.

Remedies: Measures provided, as appropriate, to a Complainant or any other person the University identifies as having had their equal access to the education program or activity limited or denied by Title IX Sexual Harassment. These measures are provided to restore or preserve that person's access to the education program or activity after the University determines that Title IX Sexual Harassment occurred.



Retaliation: Adverse action including intimidation, threats, coercion, or discrimination against any person by the University, a student, or an employee or other person authorized by the University to provide aid, benefit, or service under the education program or activity, for the purpose of interfering with any right or privilege secured by Title IX or its regulations, or because the person has reported information, made a formal complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under the Title IX regulations.

Procedure for Reporting

If you believe that you have experienced or witnessed sex discrimination, including Title IX Sexual Harassment or retaliation, the University encourages you to notify the Title IX Coordinator. A report may be made to the Title IX Coordinator, law enforcement, both, or neither. The criminal process is separate from the University's grievance procedures. Resources for contacting local law enforcement are provided in each campus's survivor guide, available at <https://www.westcliff.edu/life-at-westcliff/student-services/titleix/>.

A report informs the University of an allegation or concern about possible sex discrimination and allows the Title IX Coordinator to provide information, resources, and reasonably available Supportive Measures. Reporting conduct does not, by itself, require the reporting person to file a complaint or participate in a grievance process.

A complaint of sex discrimination is an oral or written request that the University investigate or otherwise address alleged sex discrimination. A Formal Complaint of Title IX Sexual Harassment is a signed document filed by a Complainant or signed by the Title IX Coordinator that alleges Title IX Sexual Harassment against a Respondent and requests an investigation under the federal Title IX Grievance Process. An individual may initially make a report and decide later whether to submit a complaint or file a Formal Complaint.

A University employee who has authority to institute corrective measures on behalf of the University or who has responsibility for administrative leadership, teaching, or advising is a Mandatory Reporter and must promptly report all known details of actual or suspected sex discrimination, including Title IX Sexual Harassment and retaliation, to the Title IX Coordinator. Employees who are not Mandatory Reporters are expected to provide the reporting individual with the Title IX Coordinator's contact information and information about available reporting and confidential-resource options.

Mandatory reporting requirements may be suspended during a University-sponsored public-awareness event addressing sex discrimination or sexual harassment. A Title IX Coordinator is not obligated to act in response to information provided by a person during a public event to raise awareness about Title IX Sexual Harassment that is on campus or through an online platform sponsored by the University, unless the information indicates an imminent and serious threat to the health or safety of a Complainant, any students, employees, or other persons.

An individual who seeks completely confidential assistance may do so by speaking with professionals who have legally protected confidentiality. Confidential reporting resources, such as pastoral or professional counselors do not generate reports to the Title IX Coordinator. The University does not employ confidential employees. Local crisis, mental health and victim resource hotline information is



available in each campus's survivor guide located at <https://www.westcliff.edu/life-at-westcliff/student-services/titleix/>. Information shared with confidential resources will not be shared with the University (including the Title IX Coordinator) or anyone else without express, written permission of the individual seeking services unless required by law or court order.

Supportive Measures

The Title IX Coordinator will offer and coordinate Supportive Measures as appropriate for the Complainant and/or Respondent to restore or preserve that person's access to the education program or activity or provide support during the University's Title IX Grievance Procedures or during the informal resolution process. Supportive Measures are individualized services reasonably available to ensure equal educational access, protect safety or deter prohibited conduct. Supportive Measures are available, as appropriate, to either or both the Complainant and Respondent and are non-punitive, non-disciplinary, not unreasonably burdensome and without fee or charge to either party to: (1) Restore or preserve that party's access to the education program or activity, including measures that are designed to protect the safety of the parties or the educational environment; or (2) Provide support during the grievance procedures or during an informal resolution process. Examples include counseling, extensions of time or other course-related adjustments, modifications to work or class schedules, campus escort services, restrictions on contact between the Parties, leave of absence, increased security and monitoring of certain areas on campus, and other similar measures.

Supportive Measures are individualized and appropriate based on the information gathered by the Title IX Coordinator. The Supportive Measures needed by the Complainant and/or Respondent may change over time, and the Title IX Coordinator will communicate with each party to ensure that any Supportive Measures are necessary and effective based on evolving needs.

Once the Title IX Coordinator receives a report, the Title IX Coordinator will promptly contact the Complainant confidentially to discuss the availability of Supportive Measures (available with or without filing a Formal Complaint) and provide a copy of this policy. The Title IX Coordinator will consider the Complainant's wishes with respect to Supportive Measures. The Title IX Coordinator is responsible for coordinating the effective implementation of supportive measures, in collaboration with other campus resources as deemed necessary. The parties are provided with a timely opportunity within two business days to seek modification or reversal of the University's decision to provide, deny, modify, or terminate supportive measures applicable to them. A request should be made in writing to the Title IX Coordinator. An impartial employee other than the employee who implemented the supportive measures, who has authority to modify or reverse the decision, will determine whether to provide, deny, modify, or terminate the supportive measures if they are inconsistent with the Title IX regulatory definition of supportive measures.

Victims of sexual violence offenses will also be provided with written notification about existing counseling, health and/or mental health services, victim advocacy, legal assistance, visa and immigration assistance, safety planning, timely warnings, student financial aid and other services available to victims within the University and in the community.



The University will maintain the privacy of the Supportive Measures, provided that privacy does not impair the University's ability to provide the Supportive Measures.

Online Misconduct

Although the University may not control websites, social media or other online platforms through which communication that violates the University's policy is made, the University will address reported communications. Online manifestations of the behavior prohibited in this policy are also potential violations of University policy if the communications have an effect on the education program and activity or when they involve the use of University networks, technology or equipment.

Dismissal of a Formal Complaint

Dismissal of a Formal Complaint may occur under several circumstances. the University **must dismiss** a formal complaint for Title IX purposes when:

1. The conduct alleged would not constitute Title IX sexual harassment even if proved;
2. The alleged conduct did not occur in the University's education program or activity; or
3. The alleged conduct did not occur against a person in the United States.

The University **may dismiss** when:

1. The Complainant provides written notice that the Complainant wishes to withdraw the complaint or particular allegations;
2. The Respondent is no longer enrolled or employed by the University; or
3. Specific circumstances prevent the University from gathering sufficient evidence to reach a determination.

Dismissal under Title IX does not prevent the University from proceeding under another applicable misconduct, employment, or California-law policy. Written notice of dismissal and the reasons must be sent simultaneously to the parties.

The federal Title IX Grievance Process applies to Formal Complaints alleging Title IX Sexual Harassment within the jurisdiction described in this Policy. It applies regardless of whether the Complainant or Respondent is a student or employee.

Complaints alleging other forms of sex discrimination or sexual misconduct, or conduct falling outside federal Title IX jurisdiction, may be addressed under another applicable University grievance, student-conduct, employment, or California-law procedure. Dismissal from the federal Title IX Grievance Process does not necessarily preclude action under another University policy.

When a party is both a student and an employee, the University will make a fact-specific inquiry, including whether the party's primary relationship with the University is to receive an education and whether the alleged sexual harassment occurred while the party was performing employment-related work.



Both Parties will receive equal opportunity to provide information, witness statements, evidence, and other information that may be necessary to fully evaluate the alleged offense. For this reason, it is important to preserve evidence that may assist in proving an alleged criminal offense occurred or that may be helpful in obtaining a protection order. Both Parties will be afforded equitable rights and access during the Grievance Process. The Respondent is presumed not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the Grievance Process.

Generally, the Grievance Process consists of a Formal Complaint, Investigation, Live Hearing, Disciplinary Actions, Remedies and appeal (if applicable). The Grievance Process, barring extenuating circumstances, will conclude within 90 days from the date a Formal Complaint is filed.

The University has established the following timeframes for the major stages of the grievance procedures: up to 10 days for evaluation (i.e., the decision whether to dismiss or investigate a formal complaint); up to 45 days for investigation; up to 20 days for determination; and up to 15 days for appeal, if any.

Status Updates and Extensions of Time

The University will provide the Complainant and Respondent with periodic written status updates regarding the investigation and grievance process. Status updates will be provided at reasonable intervals and will include, as appropriate, the current stage of the process and any material changes to the anticipated timeframes for completing the major stages of the grievance process.

The University may temporarily delay the grievance process or grant a limited extension of an established timeframe for good cause. Good cause may include, but is not limited to, the absence or unavailability of a party, Advisor, witness, Investigator, or Decision-Maker; concurrent law-enforcement activity; the need for language assistance or disability accommodations; the complexity or scope of the allegations; the need to obtain or review additional relevant evidence; or other circumstances that reasonably require additional time.

When a delay or extension changes the anticipated timeframe for a major stage of the grievance process, the University will provide the Complainant and Respondent with simultaneous written notice. The notice will identify the reason for the delay or extension and, when reasonably available, the revised anticipated timeframe for completing the affected stage of the process.

The University will not unreasonably deny a student party's request for an extension of a grievance-process deadline when the request is related to a period of examinations or a University closure. A student requesting an extension should submit the request to the Title IX Coordinator as soon as reasonably possible and explain the basis for the request. The Title IX Coordinator will evaluate the request in an equitable manner, considering the circumstances of the request, the need to maintain a reasonably prompt process, and the effect of the extension on both parties.

Any extension granted to one party will be administered in a manner that preserves the other party's rights and the equitable treatment of both parties. Granting an extension does not require the University to grant an identical extension to the other party when the circumstances do not warrant one.

Unless otherwise stated, references to “days” in the grievance-process timeframes mean calendar days.

Notice of Investigation and Allegations

Upon initiation of the University’s Title IX grievance procedures, the University will notify the parties in writing of the following:

- A statement that the Respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility will be made at the conclusion of the grievance process;
- A statement that the parties may have an Advisor of their choice, who may be, but is not required to be, an attorney;
- A statement that the parties will have an equal opportunity to present fact and expert witnesses and other inculpatory and exculpatory evidence;
- A statement that the parties and their Advisors will have an equal opportunity to inspect and review evidence directly related to the allegations for at least 10 calendar days and will receive the investigative report at least 10 calendar days before the hearing;
- A meaningful summary of the allegations, including the identities of the parties involved in the incident(s), the conduct alleged to constitute Title IX Sexual Harassment, and the date(s) and location(s) of the alleged incident(s);
- A statement that retaliation is prohibited;
- The name(s) of the investigator(s), along with the process an individual can follow to assert a conflict of interest concern against the assigned investigator(s);
- A statement informing the parties that knowingly making false statements, including knowingly submitting false information is prohibited; and
- Detail on how a party may request disability accommodations or other support assistance during the Grievance Procedure.

If, in the course of an investigation, the University decides to investigate additional allegations of Title IX Sexual Harassment by the Respondent toward the Complainant that are not included in the notice provided or that are included in a formal complaint that is consolidated, the University will notify the parties of the additional allegations.

The University will notify the parties in writing of the following with sufficient time for the parties to prepare before any initial interview:

- The Respondent is presumed not responsible for the alleged sexual harassment until a determination is made at the conclusion of the Grievance Procedures. Prior to such a determination, the parties will have an opportunity to present evidence directly related to the allegations and the investigative report, as described in this Policy to a trained, impartial decision maker;
- The parties may have an advisor of their choice who may be, but is not required to be, an attorney;
- The parties are entitled to an equal opportunity to access the evidence directly related to the allegations and the investigative report, as described in this Policy (10 days) and an investigative report that accurately summarizes this evidence (10 days)

- University's Code of Conduct published in the Student Handbook prohibits knowingly making false statements or knowingly submitting false information during the grievance procedures.

Advisor

Advisor

Each party has an equal opportunity to be accompanied by an Advisor of the party's choice during any meeting or proceeding related to the Title IX Grievance Process. The Advisor may be selected from inside or outside the University community and may be, but is not required to be, an attorney. The University will not limit a party's choice or presence of an Advisor in any meeting or grievance proceeding, although the University may establish restrictions regarding the extent of an Advisor's participation. Any restrictions will apply equally to both parties.

Except during cross-examination at a Live Hearing, the parties are expected to present information, answer questions, and communicate with University officials on their own behalf. During investigative interviews and other meetings, an Advisor may consult with and provide support to the party but may not answer questions for the party, make presentations, address University officials unless invited to do so, or otherwise disrupt the proceeding.

At a Live Hearing, each party's Advisor—and not the party personally—may ask the other party and witnesses all relevant questions and follow-up questions, including questions challenging credibility. Questioning must be conducted directly, orally, and in real time, subject to the Decision-Maker's determinations regarding relevance and the hearing procedures described in this Policy.

If a party does not have an Advisor present at the Live Hearing, the University will provide an Advisor, without fee or charge to that party, to conduct questioning on the party's behalf. A University-provided Advisor may, but is not required to be, an attorney. The University is not required to provide an attorney or provide legal or strategic advice merely because the other party's Advisor is an attorney.

A party may choose an Advisor who is also a witness, but doing so is discouraged because the individual's dual role may affect the orderly administration of the grievance process and the evaluation of the individual's testimony. The University will not prohibit an otherwise eligible Advisor solely because the Advisor may also be a witness.

Advisors must comply with the University's rules of decorum and may not disrupt a meeting, interview, or hearing. If an Advisor materially disrupts a proceeding or refuses to follow applicable rules, the University may pause the proceeding and require the Advisor to discontinue the disruptive conduct. If necessary, the University may require the party to select another Advisor or may provide another Advisor for purposes of conducting questioning at the Live Hearing. These rules will be applied equally to both parties.

Advisors are expected to protect the privacy of records and personally identifiable information received through the grievance process and to use such information only for purposes of advising the party or participating in the grievance process. This provision does not prohibit a party or Advisor from discussing the allegations, gathering or presenting evidence, identifying or communicating with potential witnesses,



consulting with legal counsel or confidential resources, participating in an administrative or judicial proceeding, or otherwise preparing for or participating in the grievance process.

Unless otherwise required by applicable law or University policy, each party is ordinarily permitted one Advisor at meetings, interviews, and hearings. The University may permit an additional support person upon a party's reasonable request. Any decision concerning an additional Advisor or support person will be made equitably and will not limit either party's right to an Advisor.

Investigation of Formal Complaints

The University will investigate allegations in a Formal Complaint filed by a Complainant or signed by the Title IX Coordinator. The Title IX Coordinator will respect the Complainant's wishes as to whether the University investigates an allegation, unless the Title IX Coordinator determines a formal complaint must be initiated. The University may consolidate Formal Complaints where the allegations arise out of the same facts or circumstances.

Upon receipt of a Formal Complaint, written Notice of Investigation and Allegations (as indicated above) will be sent to the Parties. The University will provide to a party whose participation is invited or expected, written notice the date, time, location, participants and purpose of the investigative interview or meeting with sufficient time for the party to prepare to participate. The University will also provide the parties with the same opportunities, if any, to have other people than the advisor of the parties' choice present during any meeting or proceeding.

Formal Complaints involving employees will also be referred to Human Resources and simultaneously evaluated under employee conduct policies and procedures.

During the investigation, the Title IX Coordinator or the Coordinator's designee ("Investigator") will conduct interviews and gather evidence. No unauthorized audio or video recording of any kind is permitted during investigation interviews/meetings. The Parties will be provided an equal opportunity to present facts and witnesses, or other evidence. The Parties (and their Advisors) will be provided with evidence directly related to the allegations, in electronic format or hardcopy, with at least 10 days for the Parties to inspect, review, and respond to the evidence. The Investigator will consider the responses received from the Parties before issuing the investigative report.

The University will provide an equal opportunity for the parties to present fact and expert witnesses and other inculpatory and exculpatory evidence. The University will objectively evaluate all relevant evidence, including inculpatory and exculpatory evidence. Credibility determinations will not be based on a person's status as a Complainant, Respondent, or witness.

Before completing the investigative report, the University will send each party and the party's advisor, if any, all evidence obtained as part of the investigation that is directly related to the allegations, including evidence upon which the University does not intend to rely and inculpatory and exculpatory evidence. The University will provide the parties at least 10 calendar days to inspect, review, and submit a written response. The investigator will consider timely responses before completing the investigative report.

The University will then send each party and the party's advisor, if any, an investigative report that fairly summarizes relevant evidence. The report will be provided at least 10 calendar days before the live hearing for review and written response.

The burden of proof and the burden of gathering evidence sufficient to reach a determination regarding responsibility rest with the University and not with the parties. The University will not access, consider, disclose, or otherwise use a party's treatment records without that party's voluntary written consent.

Interview Recording

Investigators will create a record of all interviews pertaining to the Grievance Procedure. The parties may review copies of their own interviews upon request. No unauthorized audio or video recording of any kind is permitted during investigation meetings.

Evidence

The University will objectively evaluate all evidence that is directly relevant to the allegations—including both inculpatory and exculpatory evidence. Credibility determinations will not be based on a person's status as a Complainant, Respondent, or witness.

The following types of evidence, and questions seeking that evidence, are impermissible (*i.e.*, will not be accessed or considered, except by the University to determine whether one of the exceptions listed below applies; will not be disclosed; and will not otherwise be used), regardless of whether they are relevant:

- Evidence that is protected under a privilege recognized by Federal or State law, unless the person to whom the privilege or confidentiality is owed has voluntarily waived the privilege or confidentiality;
- A party's or witness's records that are made or maintained by a physician, psychologist, or other recognized professional or paraprofessional in connection with the provision of treatment to the party or witness, unless the University obtains that party's or witness's voluntary, written consent for use in its grievance procedures; and

Evidence that relates to the Complainant's sexual interests or prior sexual conduct, unless evidence about the Complainant's prior sexual conduct is offered to prove that someone other than the Respondent committed the alleged conduct or is evidence about specific incidents of the Complainant's prior sexual conduct with the Respondent that is offered to prove consent to the alleged sexual harassment. The fact of prior consensual sexual conduct between the Complainant and Respondent does not by itself demonstrate or imply the Complainant's consent to the alleged sexual harassment or preclude determination that sexual harassment occurred.

Informal Resolution

If the Complainant and Respondent voluntarily consent in writing, formal complaints can be resolved through Informal Resolution in lieu of resolving a formal complaint through the University's grievance procedures. The University will not offer informal resolution to resolve a formal complaint when such a process would conflict with Federal, state or local law. The Title IX Coordinator will coordinate an appropriate Informal Resolution process depending on the nature of the allegations, the Parties

involved, and the overall circumstances. Informal Resolution will be conducted by a facilitator. It is not necessary to pursue Informal Resolution first in order to pursue the University's Grievance Process. At any time prior to agreeing to a resolution, any party has the right to withdraw from the Informal Resolution process and resume the Grievance Process. Before the initiation of an informal resolution process, the University will explain in writing to the parties:

- The allegations;
- The requirements of the informal resolution process;
- That any party has the right to withdraw from the informal resolution process and initiate or resume formal grievance procedures at any time before agreeing to a resolution;
- That if the parties agree to a resolution at the end of the informal resolution process, they cannot initiate or resume formal grievance procedures arising from the same allegations;
- The potential terms that may be requested or offered in an informal resolution agreement, including notice that an informal resolution agreement is binding only on the parties; and
- What information the University will maintain and whether and how the University could disclose such information for use in Title IX formal grievance procedures if such procedures are initiated or resumed.

Informal Resolution is unavailable when an employee is alleged to have sexually harassed a student.

Informal resolution cannot occur unless a Formal Complaint has been filed and both parties provide voluntary, informed, written consent.

Mediation will not be used to resolve allegations of sexual violence, as required by California law.

Live Hearing

If a Formal Complaint is not or cannot be resolved through Informal Resolution, the University will conduct a Live Hearing. Live Hearings are facilitated by designated Decision-Maker, separate from the Title IX Coordinator or Investigator. The Decision Maker will be selected by the Title IX Coordinator or Human Resources.

Live Hearings will be conducted directly, orally, and in real time. The Decision-Maker will permit each party's Advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility. Questions are asked only by Advisors and not by parties. Only relevant cross-examination and other questions may be asked of a party or witness. Before a Complainant, Respondent, or witness answers a cross-examination or other question, the Decision-Maker must first determine whether the question is relevant and explain to the party's Advisor asking cross-examination questions any decision to exclude a question as not relevant.

Questions and evidence about the Complainant's sexual predisposition or prior sexual behavior are not relevant unless offered to prove that someone other than the Respondent committed the alleged conduct or concern specific incidents of the Complainant's prior sexual behavior with the Respondent



and are offered to prove consent. The fact of prior consensual sexual conduct between the parties does not, by itself, demonstrate or imply consent to the alleged conduct.

The decision-maker may consider relevant statements of a party or witness even if that person does not participate in the hearing or answer every question. The decision-maker will evaluate the weight and reliability of such statements in light of the totality of the evidence. The decision-maker will not draw an inference regarding responsibility based solely on a person's absence or refusal to answer questions.

At the request of either party, the University will provide for the entire Live Hearing (including cross-examination) to occur with the Parties located in separate rooms with technology enabling the Parties to see and hear each other. Live Hearings may be conducted with all Parties physically present in the same geographic location or, at the University's discretion, any or all Parties, witnesses, and other participants may appear at the Live Hearing virtually. An audio or audiovisual recording, or transcript, of any Live Hearing will be created and maintained by the University for seven (7) years.

During the Grievance Process, the University will not use, rely on or seek disclosure of information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege. The University will not access or use a party's medical, psychological, and similar treatment records unless the party provides voluntary, written consent.

Standard of Evidence

For all Formal Complaints, the University utilizes the preponderance of the evidence standard, which means "more likely than not."

Disciplinary Actions and Remedies

Disciplinary Actions against the Respondent will not be imposed before completion of the University's Grievance Process. Following a determination of responsibility, appropriate corrective action will be taken, and the University will take steps to prevent recurrence. For disciplinary action to be issued under this policy, the Respondent must be a University employee or student at the time of the alleged incident. Disciplinary Actions taken will be determined on a case-by-case basis. Factors considered when determining Disciplinary Action may include but are not limited to: Nature, severity of, and circumstances surrounding the violations(s); Respondent's disciplinary history; Prior disciplinary findings involving similar conduct; Need for disciplinary action to bring an end/prevent future recurrence of the violation; Need for disciplinary action to remedy the effects on the Complainant and the University community; Impact on the parties; Any other information deemed relevant by the Decisionmaker.

Any employee determined by the University to be responsible will be subject to appropriate Disciplinary Action, up to and including termination. Disciplinary sanctions will be placed in an employee's permanent personnel file. Employees are also subject to processes and discipline determined by the Human Resources Department. A parallel Human Resources process will not impose discipline for the same Title IX allegations before completion of the required grievance process, except for permissible administrative leave or emergency removal. Disciplinary Action for student-related claims may include, but are not limited to, additional training, a restriction on contact, warning, suspension, or dismissal. Disciplinary action will be placed in a student's permanent academic file.



Failure to abide by imposed Disciplinary Actions (whether by refusal, neglect or any other reason), may result in additional Disciplinary Action, including suspension or termination.

Remedies are provided to a Complainant whenever a Respondent is found responsible. Remedies are implemented by the Title IX Coordinator and may be disciplinary and punitive. Student Remedies are designed to maintain the Complainant's equal access to education. Remedies will be determined on a case-by-case basis and may include supportive measures.

Individuals who make a materially false statement in bad faith in the course of a Title IX Grievance Process will be subject to the University's Student Code of Conduct and/or Employee Handbook as it relates to Standard Code of Conduct.

Written Determination

The Decision-Maker will issue a written determination that includes:

1. Identification of the allegations potentially constituting Title IX Sexual Harassment;
2. A description of the procedural steps taken from receipt of the Formal Complaint through the determination, including notifications to the parties, interviews, site visits, methods used to gather evidence, and hearings held;
3. Findings of fact supporting the determination;
4. Conclusions regarding the application of the University's policy to the facts;
5. A statement of, and rationale for, the result as to each allegation, including the determination regarding responsibility, any Disciplinary Sanctions imposed on the Respondent, and whether Remedies designed to restore or preserve the Complainant's equal access to the University's education program or activity will be provided; and
6. The University's appeal procedures and permissible grounds for appeal.

The University will provide the written determination simultaneously to the parties.

Appeal

Both Parties have the right to appeal a determination regarding responsibility, the University's dismissal of a Formal Complaint or any allegations therein if: (1) procedural irregularity affected the outcome of the matter; (2) there is newly discovered evidence that could affect the outcome of the matter; and/or (3) Title IX personnel had a conflict of interest or bias, that affected the outcome of the matter.

When a formal complaint is dismissed, the University will, at a minimum:

- Offer supportive measures to the Complainant as appropriate;
- If the Respondent has been notified of the allegations, offer supportive measures to the Respondent as appropriate; and
- Take other prompt and effective steps, as appropriate, through the Title IX Coordinator to ensure that Title IX Sexual Harassment does not continue or recur within the education program or activity.



An appeal must be submitted in writing to the Title IX Coordinator within 15 days of the delivery of the dismissal or Written Determination.

Notice will be provided to the other party. Both parties will be provided with equal opportunity for written statements. The appeal decision-maker will not be the same person as the Decision-Maker who reached the determination regarding responsibility or dismissal, the Investigator, or the Title IX Coordinator. The appeal decision-maker will be free from conflict of interest or bias and will issue a written decision describing the result of the appeal and the rationale for that result. The written appeal decision will be provided simultaneously to both parties.

Finality of the Determination

If a timely appeal is filed, the determination regarding responsibility becomes final on the date the University provides the parties with the written appeal decision. If no timely appeal is filed, the determination becomes final on the date the time for filing an appeal expires.

Retaliation Prohibited

The University prohibits Retaliation (including peer retaliation) against an individual for raising an allegation or cooperating in the Grievance Process.

If you believe you have been retaliated against, you should notify the Title IX Coordinator. If the University has information about conduct that reasonably may constitute retaliation under Title IX, the Title IX Coordinator will contact the reporting party or party experiencing the retaliation. Upon receiving a complaint alleging retaliation, the University will initiate its the applicable grievance procedures for complaints of sex discrimination or retaliation.

Training

The following individuals must receive training related to their duties under Title IX promptly upon hiring or change of position that alters their duties under Title IX and annually thereafter. This training is in addition to other state-required sexual harassment prevention and education. These individuals include:

(1) *All employees.* All employees must be trained on the University's obligation to address sex discrimination in its education program or activity; the scope of conduct that constitutes Title IX Sexual Harassment, including the definition of sexual harassment; and; all applicable notification and information requirements for the formal Grievance Procedure

(2) *Investigators and other persons who are responsible for implementing the grievance procedures or have the authority to modify or terminate supportive measures.* In addition to the training requirements as an employee, all aforementioned individuals must be trained on the University's obligations in the Grievance Procedure (including the live hearing); how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias and; the meaning and application of the term "relevant" in relation to questions and evidence, and the types of evidence that are impermissible regardless of relevance under the aforementioned formal grievance procedures.

(3) *Facilitators of informal resolution process.* In addition to the training requirements as an employee, all facilitators of an informal resolution process must be trained on the rules and practices associated with the informal resolution process and on how to serve impartially, including by avoiding conflicts of interest and bias.

(4) *Title IX Coordinator and designees.* In addition to the training requirements as an employee, and Grievance Procedure participant, and informal resolution officer, the Title IX Coordinator and any designees section must be trained on their specific responsibilities; the recordkeeping system; and any other training necessary to coordinate the University's compliance with Title IX.

Training will cover:

- The 2020 definition of Title IX Sexual Harassment;
- The scope of the University's education program or activity;
- Conducting investigations, hearings, appeals, and informal resolutions;
- Serving impartially and avoiding prejudice, conflicts, and bias;
- Hearing technology;
- Relevance of questions and evidence, including rape-shield protections; and
- Creating an investigative report that fairly summarizes relevant evidence.

Training materials must not rely on sex stereotypes and must promote impartial investigations and adjudications.

Bias/Conflict of Interest

Any Title IX personnel materially involved in the Grievance Procedure may neither have or demonstrate a conflict of interest or bias for a party generally, or for a specific Complainant or Respondent.

To raise any concern involving bias or conflict of interest by the Title IX Coordinator, contact the Vice President of Student Experience at (949) 825-5999. Concerns of bias or potential conflict of interest by any other Title IX personnel should be raised with the Title IX Coordinator.

Clery Act Reporting/Federal Timely Warning Obligations

University administrators will issue timely warnings for incidents reported that pose a serious or continuing threat to members of the campus community. The University will make every effort to ensure that a victim's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the danger. The University reserves the right to notify parents/guardians of dependent students regarding any health or safety risk, or a change in student status. These timely warnings are separate from emergency notifications.

Personally identifiable information for victims of Sexual Assault, Dating Violence, Domestic Violence and Stalking will not be included in any publicly available recordkeeping, including Clery Act Reporting and disclosures such as the ASR. The Title IX Coordinator will report any Clery Act violations to ensure that it is accurately recorded in the ASR. When applicable, local authorities will be notified as well. Each October, the ASR for the preceding three years will be made available to students and employees.

Emergency Removal

The University can remove a Respondent entirely or partially from the Education Program or Activities on an emergency basis when an individualized safety and risk analysis has determined that an immediate threat to the physical health or safety of any student or other individual arising from the allegations justifies removal. The risk analysis is performed by the Title IX Coordinator in conjunction with the Executive Director of Operations and/or Human Resources.

In cases in which an emergency removal is imposed, the Respondent will be given notice of the action and the option to request to meet with the Title IX Coordinator prior to such action/removal being imposed, or immediately after, to show cause why the action/removal should not be implemented or should be modified. This meeting is not a hearing on the merits of the allegation(s), but rather is an administrative process intended to determine solely whether the emergency removal is appropriate. When this meeting is not requested in a timely manner, objections to the emergency removal will be deemed waived.

The Title IX Coordinator has sole discretion under this policy to implement or stay an emergency removal and to determine the conditions and duration. Violation of an emergency removal under this policy will be grounds for discipline, which may include expulsion or termination.

The University will implement the least restrictive emergency actions possible in light of the circumstances and safety concerns. As determined by the Title IX Coordinator and/or HR, these actions could include, but are not limited to: temporarily re-assigning an employee, restricting a student's or employee's access to the campus, allowing a student to withdraw or take grades of incomplete without financial penalty, and authorizing an administrative leave.

Additional Information

Students and employees may contact the Title IX Coordinator with any questions related to this policy. Concerns about the University's application of this policy and compliance with Title IX may also be addressed to the U.S. Department of Education Office for Civil Rights ("OCR") at 400 Maryland Ave, SW Washington, D.C. 20202-1100, (800) 421-3481, <http://www.ed.gov/ocr>. For complaints involving employee-on-employee conduct, the Equal Employment Opportunity Commission or other appropriate state or federal enforcement agency can be contacted.

Recordkeeping

The University's records of investigations and resolutions are maintained for seven years. The University shall maintain records of Title IX procedures as required by law, including records of:

- Each investigation and resolution, including any determination regarding responsibility and any audio or audiovisual recording or transcript, any Disciplinary Actions imposed on the Respondent, and any supportive measures provided to the parties and any Remedies provided to the Complainant designed to restore or preserve equal access to the education Program or Activity;
- Any appeal and the result therefrom;
- Any informal resolution and the result therefrom;



- All materials used to train Title IX coordinators, investigators, Decisionmakers, and any person who facilitates an informal resolution process. The University will make these training materials publicly available on the university website.
- All materials used to train all employees consistent with the requirements in the Title IX regulations.

For each report of Title IX Sexual Harassment, records of the University's response and the measures taken to restore or preserve equal access to the University's education program or activity. These records will document the basis for the University's conclusion that its response was not deliberately indifferent. If the University did not provide a Complainant with Supportive Measures, the University will document the reasons why its response was not clearly unreasonable in light of the known circumstances.

Confidentiality/Privacy

The University makes every effort to preserve the parties' privacy. The University will keep confidential the identity of the Complainant, Respondent, and witnesses, except as may be permitted by FERPA, as required by law, or as necessary to carry out the Title IX Grievance Procedure.

The University will take reasonable steps to protect the privacy of the parties and witnesses during its grievance procedures. These steps will not restrict the ability of the parties to obtain and present evidence, including by speaking to witnesses; consult with their family members, confidential resources, or advisors; or otherwise prepare for or participate in the formal grievance procedures. The parties cannot engage in retaliation, including against witnesses.

The University will not disclose personally identifiable information obtained in the course of compliance with this policy, except in the following circumstances: (1) If there is prior written consent from a person with the legal right to consent to the disclosure; (2) When the information is disclosed to a parent, guardian, or other authorized legal representative with the legal right to receive disclosures on behalf of the person whose personally identifiable information is at issue; (3) To carry out the purpose of the policy including action taken to address conduct that reasonably may constitute Title IX Sexual Harassment; (4) As required by Federal law, Federal regulations, or the terms and conditions of a Federal award, including a grant award or other funding agreement; or (5) To the extent such disclosures are not otherwise in conflict with Title IX or this part, when required by State or local law or when permitted under FERPA, [20 U.S.C. 1232g](#), or its implementing regulations, [34 CFR part 99](#).

The parties and their advisors are prohibited from disclosing information obtained by the University through the Grievance Process, to the extent that information is the work product of the University (meaning it has been produced, compiled, or written by the University for purposes of its investigation and resolution of a formal complaint), without authorization. It is also a violation to publicly disclose University work product that contains a party or witness's personally identifiable information without authorization or consent. Violation of this Policy is subject to significant sanctions.

Nothing in this section prohibits or restricts a party from discussing the allegations under investigation; gathering and presenting relevant evidence; identifying or communicating with

potential witnesses; consulting with family members, confidential resources, legal counsel, or Advisors; participating in an administrative or judicial proceeding; or otherwise preparing for or participating in the University's grievance process. Any restrictions imposed by the University will apply equally to both parties and will not impair the rights provided under this Policy.

Disability Accommodations

Qualified students, employees or others with a disability needing reasonable accommodations should contact the Title IX Coordinator, who will work with University's ADA Coordinator as appropriate to review the request and, in consultation with the person requesting the accommodation, determine which accommodations are appropriate and necessary for full process participation.

Parenting and Pregnant Students

The University, according to university and California state protections, does not discriminate in its education program or activity against any student based on the student's current, potential, or past pregnancy or related conditions. The University does not engage in prohibited discrimination when it allows a student, based on pregnancy or related conditions, to voluntarily participate in a separate portion of its education program or activity. The University ensures that the separate portion is comparable to that offered to students who are not pregnant and do not have related conditions.

When a student, or a person who has a legal right to act on behalf of the student, informs any employee of the University of the student's pregnancy or related conditions, unless the employee reasonably believes that the Title IX Coordinator has been notified, the employee promptly provides that person with the Title IX Coordinator's contact information and informs that person that the Title IX Coordinator can coordinate specific actions to prevent sex discrimination and ensure the student's equal access to education programs or activities.

The University does not require supporting documentation unless the documentation is necessary and reasonable for the University to determine the reasonable modifications for the qualifying student.

Reasonable Modifications

The University ensures that reasonable modifications to the policies, practices, or procedures will be provided as necessary to prevent sex discrimination and ensure equal access to the education programs or activities. Each reasonable modification is based on the student's individualized needs. In determining what modifications are required under this paragraph, the University will consult with the student. If a modification would fundamentally alter the nature of its education program or activity, the Title IX Coordinator must demonstrate it is not a reasonable modification.

A student has discretion to accept or decline each reasonable modification offered. Reasonable modifications may include, but are not limited to:

- Breaks during class to express breast milk, breastfeed, or attend to health needs associated with pregnancy or related conditions, including eating, drinking, or using the restroom;
- Intermittent absences to attend medical appointments;

- Access to online or homebound education;
- Changes in schedule or course sequence;
- Extensions of time for coursework and rescheduling of tests and examinations;
- Allowing a student to sit or stand, or carry or keep water nearby;
- Counseling;
- Changes in physical space or supplies (for example, access to a larger desk or a footrest);
- Elevator access; or other changes to policies, practices, or procedures.

Voluntary Leave

Pregnant students are allowed to voluntarily access any separate and comparable portion of the education program or activity. Students may also voluntarily take a leave of absence from the University educational program or activity to cover, at minimum, the period of time deemed medically necessary by the student's licensed healthcare provider. To the extent that a student qualifies for leave under the University's leave of absence policy, that allows a greater period of time than the medically necessary period, a student is permitted to take voluntary leave under that policy instead of the parenting and pregnant policy if the student so chooses. When the student returns to the University, the student will be reinstated to the academic status and, as practicable, to the extracurricular status that the student held when the leave began.

Lactation Space

The University ensures parenting students can access a lactation space that is clean, shielded from view, free from intrusion from others, and may be used by a student for expressing breast milk or breastfeeding as needed. To request information on the lactation space available, contact Title IX Coordinator.

Sexual Violence – Immediate Care and Preservation of Evidence

Any person who has experienced sexual violence is encouraged to seek safety and medical care as soon as possible. If there is an immediate threat or medical emergency, call 911 or go to the nearest emergency department. Medical care may address injuries, pregnancy prevention, testing and treatment for sexually transmitted infections, HIV post-exposure prophylaxis, and other health concerns.

A person may also request a sexual assault medical forensic examination from a qualified healthcare provider. Seeking medical care or an examination does not require the individual to make a report to the University or participate in a University resolution process. To the extent permitted by applicable law, an individual may obtain a forensic examination without deciding immediately whether to report the incident to law enforcement.

Preserving evidence may assist in establishing that an offense occurred and may be helpful in a criminal investigation, a University proceeding, or obtaining a protective order. Because evidence can be lost over time, individuals are encouraged to obtain medical care and evidence collection as promptly as possible. If it is safe and medically feasible, an individual should avoid showering, bathing, washing, brushing or flossing their teeth, using the restroom, eating, drinking, smoking, changing clothes, or cleaning the location where the incident occurred until they have received guidance from a medical professional. However, an examination may still be valuable even if the individual has already taken any of these actions or significant time has passed.

Clothing or other items associated with the incident should not be washed or discarded. If clothing has been removed, each item should be placed separately in a clean paper bag rather than a plastic bag. Individuals are also encouraged to preserve electronic evidence, including text messages, emails, photographs, social-media communications, call records, location information, and screenshots, without altering or deleting the original material.

If drug-facilitated sexual violence is suspected, the individual should inform the healthcare provider as soon as possible because some substances leave the body quickly. Medical needs always take priority over evidence collection.

The University can assist an individual in locating medical care, a forensic examination, confidential advocacy services, and law-enforcement resources. The individual may choose to notify law enforcement, receive University assistance in making that notification, or decline to notify law enforcement. These choices do not affect the individual's ability to request reasonably available supportive measures or other University assistance.

Prevention and Education

Educational programs designed to promote the prevention and awareness of sexual violence are provided to all incoming students prior to or during their New Student Orientation (NSO) and/or via an interactive, online learning module taken during their first semester or session of class. These programs are provided in a combination of live/ recorded and/or self-paced virtual format and are used for students at all campuses. This format accommodates the need for flexibility and ease of access that is most appropriate for students that have grown accustomed to online learning over the last several years. Title IX Training that is provided during a student's NSO is designed to promote awareness, understanding, and compliance with Title IX regulations pertaining to sexual violence as well as harassment and discrimination, while fostering a safe and inclusive environment at WU. Students are empowered to recognize and prevent gender based violence through the combination of interactive sessions, educational resources, and open dialogue. WU prohibits the crimes of dating violence, domestic violence, sexual assault and stalking at all of its campuses. The Title IX training is designed to stop these crimes before they occur by promoting positive behaviors that foster healthy, mutually respectful relationships and sexuality, encourage safe bystander intervention, and motivate behavioral changes to foster a culture of positive, mutually beneficial social interaction.

The training:

- Identifies domestic violence, dating violence, sexual assault, and stalking as prohibited conduct;
 - Defines what behavior constitutes domestic violence, dating violence, sexual assault, and stalking;
 - Provides definitions of dating violence, sexual assault, and stalking in local jurisdiction
- Defines what behavior and actions constitute consent to sexual activity in California, Texas, and Florida
- Provides safe and positive options for bystander intervention that may be carried out by an individual to prevent harm or intervene when there is a risk of sexual violence against a person other than the bystander. For instance, in a situation involving sexual assault, domestic or dating violence, or stalking, a bystander should minimize risk and: ○ Approach everyone as a friend; ○ Not be antagonistic; ○ Avoid violence; ○ Be honest and direct whenever possible; ○ Recruit help, if possible; ○ Keep safe; and ○ If things get out of hand, contact the police.

- Provides information on risk reduction so that students and employees may recognize warning signs of abusive behavior and ways to minimize the risk of potential attacks. ○ Includes safe options for bystander intervention ○ Encourages general safety practices such as using the buddy system in unmonitored areas
- Explains that domestic and dating abuse often escalates from threats and verbal abuse to violence. While physical injury may be the most obvious danger, the emotional and psychological consequences of domestic and dating violence are also severe. Warning signs of dating and domestic violence include: ○ Being afraid of your partner; ○ Constantly watching what you say to avoid a “blow up;” ○ Feelings of low self-worth and helplessness about your relationship; ○ Feeling isolated from family or friends because of your relationship; ○ Hiding bruises or other injuries from family or friends; ○ Being monitored by your partner at home, work or school; and ○ Being forced to do things you don’t want to do. ● Additional resources are provided to students as part of the training

In addition to trainings provided to new students, awareness campaigns, such as the stalking awareness campaign and VAWA resource notifications are provided to enrolled students to facilitate increased awareness of sexual violence with a focus on developing skills to address these topics.

WU Employees are provided with information about sexual harassment and prohibitions on sexual misconduct in the employee handbook and are required to take a one to two hour training on sexual harassment and unlawful discrimination every two years for the duration of their employment. The length of the sexual harassment and unlawful discrimination training and employee that is required is dependent on whether the employee holds a supervisor level position or not. Additional training is provided annually to all employees to promote the awareness and prevention of domestic violence, dating violence, sexual assault, and stalking. As with the student training, training provided for employees is designed to stop crimes of sexual violence before they occur by promoting positive behaviors that foster healthy, mutually respectful relationships and sexuality, encourage safe bystander intervention, and motivate behavioral changes to foster a culture of positive, mutually beneficial social interaction. This training reinforces WU’s prohibition on domestic violence, dating violence, sexual assault, and stalking and covers the same range of topics covered in the student trainings described above, but with relevance to employees and additional emphasis on how employees can facilitate a culture of safety and help students should they become aware that they are victims of sexual violence.